

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MARYLAND
GREENBELT DIVISION**

**In re
JAMES CONNORS**

**CASE NO. 20-12860
CHAPTER 7**

Debtor

MOTION FOR REFUND OF FILING FEE

The undersigned filed a Motion to Reopen debtor's bankruptcy on April 26, 2021 and August 19, 2021¹ in order to file an adversary proceeding to challenge the non-dischargeability of debtor's student loans under 11 U.S.C. § 523(a)(8). According to Rule 4007(b), "A case may be reopened without payment of an additional filing fee for the purpose of filing a complaint to obtain a determination under this rule."

Maryland's ECF system does not allow a bypass for the filing fee.² As such, the filing fee of \$260 was paid for each motion filed. The motions were granted, the adversary complaint was filed and served. The undersigned respectfully requests that the Court refund the \$520 filing fees.

Dated October 5, 2021

Respectfully Submitted,
JAMES CONNORS
By his attorneys,

/s/Joshua Cohen
Joshua Cohen, pro hac vice
Cohen Consumer Law, PLLC

¹ Though the April motion was granted, the undersigned was unable to file the AP within the Court's deadline.

² The undersigned understands that the creation and maintenance of the ECF system is no small feat. However, a review of Vermont's and the Northern District of Illinois' ECF system may be of interest as their systems allow for the bypass of a filing fee for such motions.

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